



Asociación Interamericana de Hombres de Empresa

CAPITULO DE SAN JUAN

P.O Box 195630 San Juan, PR 00919

September 6, 2012

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Chairman Genachowski:

The Inter American Businessmen Association was founded in 1961 by Hispanic business leaders with the goal of fostering an environment for economic growth and free market principles to solving our common problems. We continue to work with Hispanic leaders to grow new opportunities within the Hispanic community. We are headquartered in the United States Territory of Puerto Rico. As an organization committed to free enterprise, we are writing to express concern over recent reply comments to the FCC's Notice of Proposed Rulemaking pertaining to third-party billing. Specifically, we wish to address erroneous comments regarding landline third-party billing and its association with "cramming." Each year, millions of Americans use wireline third-party billing to access services that allow them to stay connected in a manner that saves time and money for consumers and small businesses.

In particular, we object to the Federal Trade Commission's reply comment to the FCC's Notice of Proposed Rulemaking, referring to wireline third-party billing as "used almost exclusively by scam artists."

This is simply untrue. Wireline third-party billing provides invaluable services for consumers and small businesses alike. Hundreds of thousands of minority households rely on third-party billing to make calls to loved ones in the U.S. and abroad. Additionally, wireline third-party billing allows businesses to consolidate multiple services onto a single bill, eliminating overhead and administrative costs, as well as a need to use high-interest credit cards to pay for services. Reduced operating costs in turn keep prices low for consumers. Without third-party billing, these businesses would lose a valuable, cost-effective way to stay competitive and expand their business.

There is a wide swath of legitimate calling services, the billing for which is provided on wireline phone bills, from long-distance and collect calling services to operator assisted calling, among others.

Latinos, particularly those with friends or loved ones living abroad, benefit from wireline third-party billing services. In fact, each year, wireline third-party billing enables more than 11 million calls between the U.S. and locations throughout Latin America. Moreover, Hispanic-owned small businesses grew by nearly 44 percent between 2002 and 2007. This is more than double the national growth rate of 18 percent. Latinos use these legitimate services to reduce administrative costs and overhead, allowing them to save resources, improve customer service and grow their businesses.

We have previously commented on FCC's proposed "opt-in" rule as resulting in unintended consequences for Hispanic small businesses and consumers. We reiterate this concern and maintain that consumers should be protected from phone bill cramming. However, we simply cannot support the notion that even a substantial fraction of third-party billing is associated with "scam artists."

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As you consider your proposed rule, we urge you to take into account the wide array of legitimate services made possible through wireline third-party billing. We further urge you to consider the ramifications for the millions of Hispanic Americans who would see their phone bills increase, as well as the many small businesses that will be negatively impacted by a decision to require an "opt-in" to third-party billing services.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ricardo Aponte Parsi".

Ricardo Aponte Parsi, Esq.

President- Inter American Businessmen Association